

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re: Equifax, Inc. Customer  
Data Security Breach Litigation

This document relates to:

FINANCIAL INSTITUTION ACTIONS

MDL Docket No. 2800  
No. 1:17-md-2800-TWT

Chief Judge Thomas W. Thrash, Jr.

**JOINT MOTION FOR EXTENSION OF BRIEFING SCHEDULE FOR  
DEFENDANTS' MOTION TO DISMISS THE FINANCIAL  
INSTITUTIONS' CONSOLIDATED AMENDED COMPLAINT**

Plaintiffs in the Financial Institution Actions (“Plaintiffs”) and Defendants Equifax Inc. and Equifax Information Services LLC (“Defendants”) respectfully submit this Joint Motion for Extension of Briefing Schedule for Defendants’ Motion to Dismiss the Financial Institutions’ Consolidated Amended Complaint. In support of this motion, the parties state as follows:

1. On March 23, 2018, the Court entered Case Management Order No. 3 (Dkt. No. 248), directing Plaintiffs to file a master consolidated complaint by May 30, 2018, and setting forth a briefing schedule for Defendants’ Rule 12(b) motions, with Defendants to file their Rule 12(b) motion on or before July 16, 2018; Plaintiffs to file their opposition on or before August 30, 2018; and Defendants to

file a reply on or before October 1, 2018;

2. On May 30, 2018, Plaintiffs filed their Consolidated Amended Complaint (“CAC”) (Dkt. No. 390);

3. On July 16, 2018, Defendants filed their motion to dismiss the CAC (Dkt No. 435);

4. In its motion to dismiss, Defendants challenge the sufficiency of Plaintiffs’ allegations and raise statutory and constitutional arguments challenging each of the claims Plaintiffs assert;

5. Given the complexity and number of the issues raised in Defendants’ motion to dismiss, the parties respectfully request an extension of time to brief Defendants’ motion to dismiss;

6. Plaintiffs and Defendants have conferred and agreed to jointly request that the briefing on Equifax’s motion to dismiss the CAC be extended as follows:

- i. Plaintiffs’ opposition to Defendants’ motion to dismiss to be filed on or before September 20, 2018; and
- ii. Defendant’s reply to be filed on or before November 1, 2018.

THEREFORE, the parties respectfully request that the Court grant this Joint Motion and extend the parties’ briefing schedule accordingly. A proposed Order is attached as **Exhibit A**.

Respectfully submitted this 8th day of August, 2018.

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo

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**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This Response was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted this 8th day of August, 2018.

/s/ Joseph P. Guglielmo  
Joseph P. Guglielmo

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Joseph P. Guglielmo  
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